

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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HC2, INC., : Civil Action No.: 1:20-cv-3178 (LJL)
Plaintiff, :
: [PROPOSED] ORDER REGARDING
: EXPEDITED DISCOVERY AND
: BRIEFING SCHEDULE FOR THE
: PRELIMINARY INJUNCTION HEARING
: ANDREW DELANEY,
: Defendant.
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On April 22, 2020, plaintiff HC2, Inc. (“HC2”) filed its verified complaint and memorandum of law in support of its *ex parte* motion by order to show cause for a temporary restraining order and a preliminary injunction (the “PI Motion”), against defendant Andrew Delaney (“Delaney”). On April 29, 2020, Delaney opposed the PI Motion. After hearing the arguments of counsel, the Court granted a temporary restraining order on April 29, 2020 and, I that order, directed the parties to meet and confer and submit a proposed case management plan with respect to discovery generally by 5:00 p.m. on May 4, 2020. The Court’s April 29 Order also authorized expedited discovery in advance of the Preliminary Injunction Hearing.

On May 6, 2020, the Court heard arguments from counsel for both parties with respect to a general case management plan, as well as expedited discovery and a briefing schedule for the Preliminary Injunction hearing. Having reviewed the parties’ submissions and in consideration of the arguments at the hearing on May 6, the Court orders as follows:

1. All initial document requests, interrogatories, and requests for admission with respect to expedited discovery for the purpose of the Preliminary Injunction Hearing shall be served by 5:00 p.m. on May 8, 2020, by email to the parties' respective counsel at the email addresses identified below;
2. All documents with respect to expedited discovery for the purpose of the Preliminary Injunction Hearing shall be produced and responses to initial interrogatories and initial requests to admit shall be served by 5 p.m. ET on May 13, 2020;
3. The parties shall file a joint Stipulation Regarding Certain Non-Disputed Facts, if any, on or before May 18, 2020;
4. HC2 may file a supplemental memorandum of law in support of the PI Motion no later than May 20, 2020;
5. Delaney shall file his opposition to the supplemental memorandum in support of the PI Motion by May 23, 2020; and
6. HC2 shall file its reply in further support of its supplemental motion in support of the PI Motion on May 25, 2020.
7. The parties shall appear for an evidentiary hearing on the PI Motion, by dialing the Court's conference line at 888-251-2909 (access code 2123101), at 12:00 p.m. on May 27, 2020.

SO ORDERED.

This ____ day of _____, 2020.

LEWIS J. LIMAN
United States District Judge